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May 18, 1999

Dockets Management Board
(HFA-305)
Food & Drug Administration
Room 1061
5630 Fishers Lane
Rockville MD 20852

**Re: Docket No. 98N-1038 Irradiation in the Production,
Processing and Handling of Food
Proposed Rule. 64 Fed. Reg/7834 (February 17, 1999)**

Dear Sir or Madam:

As a company widely known for its high quality food products and famous brands, Hormel Foods Corporation ("Hormel") is keenly interested in any production process and the labeling thereof which assures product safety particularly in light of the rash of Class I recalls and television specials involving e-coli and lysteria in ready-to-eat meat and poultry products. Such events only underscore the need for continuing industry and regulatory vigilance in the pursuit of providing safe food products to the public and labeling them appropriately.

Hormel slaughters, processes and distributes for sale in food service channels and at retail a variety of meat, meat based products, and certain non-meat products under the **Hormel** label. These products are sold fresh, refrigerated, frozen and canned. For the fiscal year 1998, Hormel sales were in excess of \$3 billion.

Hormel has already expressed concern to the U.S. Department of Agriculture ("USDA") about its delay in approving the irradiation of meat and poultry products. See USDA Proposed Rule 64 Federal Register 9089 (March 4, 1999). Equally concerning is the

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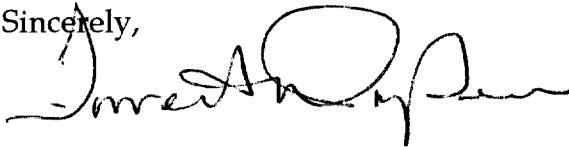
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FDA's inaction in approving appropriate labeling of food product employing irradiation, particularly in light of the FDA Modernization Act of 1997 which mandates FDA action on labeling of irradiated foods within 12 months after the date of enactment. Despite this clear direction from Congress, FDA has taken 15 months merely to develop a proposed rule. At the same time, the Agency was directed in the Act to avoid "inappropriate" consumer anxiety in any on package disclosure of irradiation.

Hormel Foods supports the use of any labeling statement that explains the use of irradiation such as "to extend shelf life," "to promote food safety" and the like. However, simply labeling the food as "irradiated" with no elaboration simply causes consumers "inappropriate anxiety" a condition the Act above specifically seeks to avoid.

Time is passing with no action in sight. In light of the increased need for this technology, Hormel Foods urges swift FDA action consistent with Congressional directives above.

Sincerely,

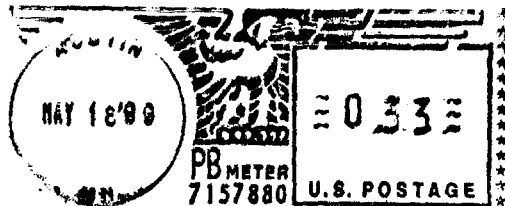
A handwritten signature in black ink, appearing to read "Forrest D. Dryden". The signature is fluid and cursive, with a large loop at the end.

Forrest D. Dryden, Ph.D.

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